

# TSD File Inventory Index

Date: July 16, 2009

Initial: CMH/verano

Facility Name: <u>Griff Brothers Corporation (Gre-Talder Sate)</u>			
Facility Identification Number: <u>ILD 085 346 468</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments		C.2 Compliance/Enforcement	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
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A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
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A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	
		5. RFI OAPP	

Total: 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1			

Note: Transmittal Letter to Be Included with Reports.

Comments: *On file in file*



Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 12/31/02  
GSA No. 0246-EPA-01

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)  
MAR 15 2001

PROGRAM MANAGEMENT BRANCH

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. Initial Notification ☒ B. Subsequent Notification (Complete item C)

### C. Installation's EPA ID Number

IL D 085346468

## II. Name of Installation (Include company and specific site name)

GREIF BROS CORPORATION

## III. Location of Installation (Physical address not P.O. Box or Route Number)

### Street

4300 WEST 130<sup>th</sup> STREET

### Street (Continued)

### City or Town

ALSIP

### State

IL

### Zip Code

60303

### County Code

031

### County Name

COOK

## IV. Installation Mailing Address (See instructions)

### Street or P.O. Box

SAME

### City or Town

### State

### Zip Code

## V. Installation Contact (Person to be contacted regarding waste activities at site)

### Name (Last)

COX

### (First)

MATTHEW

### Job Title

OPS MANAGER

### Phone Number (Area Code and Number)

708-371-4777

## VI. Installation Contact Address (See instructions)

A. Contact Address  
Location Mailing

☒

### B. Street or P.O. Box

### City or Town

### State

### Zip Code

## VII. Ownership (See instructions)

### A. Name of Installation's Legal Owner

GREIF BROS CORPORATION

### Street, P.O. Box, or Route Number

425 WINTER ROAD

### City or Town

DELAWARE

### State

OH

### Zip Code

43015

### Phone Number (Area Code and Number)

740-549-6100

### B. Land Type

P

### C. Owner Type

P

### D. Change of Owner Indicator

Yes

☒

No

☐

### Date Changed

Month

03

Day

01

Year

2001

3/16/01



ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities	C. Used Oil Management Activities
<p>1. Generator (See Instructions)</p> <p><input checked="" type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input type="checkbox"/> b. 100 to 1000 kg/mo (220-2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify _____</p>	<p>1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Transporter</p> <p><input type="checkbox"/> b. Transfer Facility</p> <p>2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Processor</p> <p><input type="checkbox"/> b. Re-refiner</p> <p><input type="checkbox"/> 3. Off-Specification Used Oil Burner</p> <p>4. Used Oil Fuel Marketer</p> <p><input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner</p> <p><input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications</p>
<p>B. Universal Waste Activity</p> <p><input type="checkbox"/> Large Quantity Handler of Universal Waste</p>	

## IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1 T003	2 F005	3	4	5	6
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D005	D007	D035	

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
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## X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature <i>Matthew W. Cox</i>	Name and Official Title (Type or print) MATTHEW W. COX OPERATIONS MGR	Date Signed 3-6-01
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## XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD085346468

REACKNOWLEDGEMENT

VAN LEER CONTAINERS INC  
4300 WEST 130TH STREET  
ALSIP IL 60658

INSTALLATION ADDRESS

4300 WEST 130TH STREET  
ALSIP IL 60658

M 5/2/84



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD085346468

REACKNOWLEDGEMENT

INLAND STEEL CONTAINER CO  
4300 WEST 130TH STREET  
CHICAGO

IL 60658

INSTALLATION ADDRESS

4300 WEST 130TH STREET  
CHICAGO

IL 60658



U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

I. INSTALLATION'S EPA I.D. NO.	5/2/84 CHANGE OF OWNER / OPERATOR <i>Syl</i>	RECEIVED
II. NAME OF INSTALLATION	PLEASE PLACE LABEL IN THIS SPACE	From: Inland Steel Cont. To: Van Leer Cont.
III. LOCATION OF INSTALLATION	APR 30 1984 WMD-RAIU EPA, REGION V	RECEIVED

**FOR OFFICIAL USE ONLY**

COMMENTS																				
C																				
C																				
15	16																			55
INSTALLATION'S EPA I.D. NUMBER										APPROVED					DATE RECEIVED (yr., mo., & day)					
S										T/A	C									
F	1	L	D	0	8	5	3	4	6	4	6	8			1					
1	2									13	14	15	16			17			22	

I. NAME OF INSTALLATION

[illegible]

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX																								
C	3	4	3	0	0	W	1	3	0	t	h	S	t	r	e	e	t							
15	16																			45				
CITY OR TOWN																		ST.		ZIP CODE				
C	4	A	1	s	i	p												I	L	6	0	6	5	8
15	16																	40	41	42	43			

### III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER																								
C																								
5	4	3	0	0	W	1	3	0	t	h	S	t	r	e	e	t								
15	16																					45		
CITY OR TOWN																		ST.		ZIP CODE				
C																								
6	A	1	s	i	p													I	L	6	0	6	5	8
15	16																			60	61	62	63	64

#### IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)															PHONE NO. (area code & no.)																	
C																																
2	G	1	a	s	s	m	a	n	W	a	y	n	e	V	P	M	F	G	3	1	2	-	5	6	8	-	3	5	3	5		
AN	LG	I														AS	GS	1	2	-	GS			GS	1	2	-	GS	3	5	3	5

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER																																	
C																																	
8	R	O	Y	A	L	P	A	C	K	A	G	I	N	G	I	N	D	U	S	T	R	I	E	S	V	A	N	L	E	E	R	B	V

**B. TYPE OF OWNERSHIP**  
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL  
M = NON-FEDERAL

☒ A. GENERATION

**B. TRANSPORTATION** (complete item VII)

☐ C. TREAT/STORE/DISPOSE

#### ☐ D. UNDERGROUND INJECTION

**VII. MODE OF TRANSPORTATION** (transporters only – enter “X” in the appropriate box(es))

☐ <sub>61</sub> A. AIR      ☐ <sub>62</sub> B. RAIL      ☐ <sub>63</sub> C. HIGHWAY      ☐ <sub>64</sub> D. WATER      ☐ <sub>65</sub> E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

**A. FIRST NOTIFICATION**

**B. SUBSEQUENT NOTIFICATION** (complete item C)

C. INSTALLATION'S EPA I.D. NO.

I	L	D	0	8	5	3	4	6	4	<sup>6</sup> <del>1</del> 8
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## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



I.D. - FOR OFFICIAL USE ONLY															
S													T/A	1	
W	1	2											13	14	15

**IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)**

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

<input checked="" type="checkbox"/> 1. IGNITABLE (D001)	<input type="checkbox"/> 2. CORROSIVE (D002)	<input type="checkbox"/> 3. REACTIVE (D003)	<input checked="" type="checkbox"/> 4. TOXIC (D000)
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**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE W. O. Glassman	NAME & OFFICIAL TITLE (type or print) Vice President - Manufacturing	DATE SIGNED 4/27/84
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U.S. ENVIRONMENTAL PROTECTION AGENCY

## NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	INLAND STEEL CONTAINER CO. 4300 WEST 130 <sup>TH</sup> STREET CHICAGO, IL 60658 PLEASE PLACE LABEL IN THIS SPACE  Some 000129 SEP 24 80
NAME OF INSTALLATION	
INSTALLATION MAILING ADDRESS	
LOCATION OF INSTALLATION	

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

## COMMENTS

15	16																			35
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INSTALLATION'S EPA I.D. NUMBER													APPROVED			DATE RECEIVED (yr., mo., & day)									
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22				
1LD085346468													A			800922									

## I. NAME OF INSTALLATION

23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55		
INLAND STEEL CONTAINER CO																																		

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX																																		
3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35		
4300 WEST 130 <sup>TH</sup> STREET																																		
CITY OR TOWN																																		
4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35			
CHICAGO													IL 60658																					

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER																																		
5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35				
4300 WEST 130 <sup>TH</sup> STREET																																		
CITY OR TOWN																																		
6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35					
CHICAGO													IL 60658																					

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)																									PHONE NO. (area code & no.)									
2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	
GLASSMAN WAYNE PLANT MANAGER																									312-568-3535									

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER																																		
8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35							
INLAND STEEL COMPANY																																		

## B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL  
M = NON-FEDERAL

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

## C. INSTALLATION'S EPA I.D. NO.

1LD085346468

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

SEP 22 1980



W	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F017 23 - 26	2 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K079 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U122 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 U188 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME &amp; OFFICIAL TITLE (type or print)

Wayne O. GLASSMAN PLT MGR

DATE SIGNED

9/22/80



U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

ILD085346468

PLEASE PLACE LABEL IN THIS SPACE

001527 AUG 20 80

## FOR OFFICIAL USE ONLY

## COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED  
(yr., mo., & day)

F 1LD085346468

T/A C  
2 1

A

800818

## I. NAME OF INSTALLATION

INLAND STEEL CONTAINER CO.

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

4300 West 130th Street

CITY OR TOWN

Chicago

ST.

ZIP CODE

IL 60658

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

54300 West 130th Street

CITY OR TOWN

Chicago

ST.

ZIP CODE

IL 60658

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

Wayne O Glassman

PHONE NO. (area code &amp; no.)

312-568-3535

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

Inland Steel Company

B. TYPE OF OWNERSHIP  
(enter the appropriate letter into box)F = FEDERAL  
M = NON-FEDERAL

M

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILD085346468

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 18 1980



## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K079					
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U122	U188				
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE  
(D001)

☐ 2. CORROSIVE  
(D002)

☐ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Wayne O. Glassman Plant Manager	DATE SIGNED 8/14/80
--	---	------------------------



# VAN LEER CONTAINERS, INC.

4300 WEST 130TH STREET  
CHICAGO, ILLINOIS 60658

312/568-3535

January 19, 1984

RECEIVED

JAN 23 1984

WASTE MANAGEMENT BRANCH  
EPA, REGION V

RCRA Activities  
P. O. Box A-3587  
Chicago, IL 60690

Re: USEPA ID# ILD085346468 - Chicago, IL Plant of Inland  
Steel Container Co.

Gentlemen:

As a result of my phone discussion with Ms. Marie Oliver of USEPA Region V RCRA office the purpose of this letter is to request that the name on the subject hazardous waste generator identification number be changed from Inland Steel Container Co. to Van Leer Containers, Inc.

On January 1, 1984 the Royal Packaging Industries Van Leer B.V. completed the purchase of Inland Steel Container Company from Inland Steel Company.

The purchase includes all the container manufacturing plants located at Chicago (Alsip), Illinois; Jersey City, New Jersey; Greenville and Cleveland, Ohio and Canton, Mississippi.

The new company name is Van Leer Containers, Inc. with headquarters at the present offices at 4300 W. 130th Street, Chicago, Illinois. Other offices, plant addresses, as well as phone numbers will remain the same.

Please contact me if you have any questions or need additional information.

Sincerely,

*H. T. Perrin*

H. T. Perrin  
Technical Director

/gt

CC: R. L. Collis  
W. O. Glassman  
C. J. Smith

RECEIVED  
1-23-84

## C.2 Compliance and Enforcement

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5HS-12

MAY 16 1988

Mr. B.I. Baman  
Production Manager  
Van Leer Containers  
Alsip, Illinois 60658

Re: Van Leer Containers  
ILD 085 346 468

Dear Mr. Baman:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on April 22, 1988. The stated actions appear to adequately address the land disposal restriction deficiency outlined in our March 25, 1988, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS  
Harry Chappel, IEPA, CMS

## CONCURRENCES

MBOL							
SURNAME	O.R.	BR		P.E.D.			
DATE	5/3/88	5/13/88		5-13-88			





Van Leer Containers, Inc.  
4300 West 130th Street  
Chicago, Illinois 60658

Tel. (312) 568-3535  
Telex 750461

April 22, 1988

Mr. W. E. Muno  
RCRA Enforcement Section  
USEPA, Region 5  
230 S. Dearborn St.  
Chicago, IL 60604

Dear Sirs:

With reference to your letter of 3/25/88 regarding notice of violation ILD 085-346-468, we have instituted a written procedure for the handling of all our waste streams; copies are appended. This procedure indicates the requirements for labelling and disposing of each stream and any special instructions, such as the inclusion of the land ban notification form. A copy of the procedure is appended.

Also appended is a copy of our last shipment of F waste with land ban notification included.

If you have any further questions with reference to our procedures, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Brian J. Farmer'.

Brian J. Farmer  
Laboratory Director

Enc.

BJF/gt

RECEIVED  
APR 25 1988  
U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

- 2 -

5HE-12

25 MAR 1988  
 A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, demonstrating that the above-cited violations have been corrected. **CERTIFIED MAIL RETURN RECEIPT REQUESTED** Measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal action.  
 Mr. B.I. Baman  
 Production Manager  
 Van Leer Containers  
 Alsip, Illinois 60658  
 Questions regarding this correspondence, please contact my staff at (312) 353-7922.

Sincerely yours  
**ORIGINAL SIGNED BY**  
**WILLIAM E. MUNO**

Re: Notice of Violation  
 Van Leer Containers  
 ILD 085 346 468

William E. Muno, Chief  
 Dear Ms. Baman: Section

On December 11, 1987, the Jacobs Engineering Group Inc., representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents. The land disposal restrictions became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, Parts (reference 52 Federal Register 25760: revisions to 262, 264, 265, 268, and 270-271).

With respect to the land disposal restrictions (40 CFR 268) section of the inspection, your facility was found to be in violation of the following

Failure to notify in writing for each shipment of F-solvent wastes the applicable treatment standard, U.S. EPA hazardous waste number, manifest number, and waste analysis data, if available as required by 268.7(a)(1).

## CONCURRENCES

ISOL						
SURNAME	EO	BIC	PSA	OP	WEN	
DATE	3/14/88	3/14/88	3/17/88	3/17/88	3/21/88	

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

- 2 -

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours  
**ORIGINAL SIGNED BY**  
**WILLIAM E. MUNO**

William E. Muno, Chief  
RCRA Enforcement Section

Enclosure

cc: Harry Chappel, IEPA  
Glenn Savage, IEPA

5HS-12:BRUSSELL:3/11/88:ea

DOCUMENT 26 DISK #1

## CONCURRENCES

BOL							
SURNAME	EC	BIC	PSA	AP	WEM		
DATE	3/14/88	3/14/88	3/12/88	3/18/88	3/24/88		



**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery  
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to:  Mr. B.I. Baman Production Manager Van Leer Containers Alsip, Illinois 60658	4. Article Number <div style="text-align: center; font-weight: bold; font-size: 1.2em;">P 250 801 231</div> Type of Service: <input type="checkbox"/> Registered <span style="margin-left: 40px;"><input type="checkbox"/> Insured</span> <input checked="" type="checkbox"/> Certified <span style="margin-left: 40px;"><input type="checkbox"/> COD</span> <input type="checkbox"/> Express Mail
Always obtain signature of addressee or agent and <b>DATE DELIVERED</b> .	
5. Signature — Addressee <input checked="" type="checkbox"/>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent <input checked="" type="checkbox"/>	
7. Date of Delivery <div style="font-size: 1.2em;">3/28/88</div>	

PS Form 3811, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 DOMESTIC RETURN RECEIPT


P 250 801 231

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to	Mr. B.I. Baman
Street and No.	Van Leer Containers
P.O., State and ZIP Code	Alsip, Illinois 60658
Postage	\$ 1.24
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.70
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 2.69
Postmark or Date	

PS Form 3800, June 1985  
 ★ U.S.G.P.O. 1985-480-794



B. Russell 1 (5HS-12) 230 S. Dearborn, Chicago, IL 60604



UNITED STATES POSTAL SERVICE  
OFFICIAL BUSINESS



**SENDER INSTRUCTIONS**

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE  
USE, \$300

RETURN  
TO



Print Sender's name, address, and ZIP Code in the space below.

Barbara Russell (5HS-12)

U.S. Environmental Protection Agency

230 S. Dearborn, Chicago, IL 60604

Feb-88

Please print or type. Form designed for use on elite (12-pitch) typewriter. SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILDQ85346468	Manifest Document No. 00001	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Van Leer Containers, Inc. 4300 W. 130th St. - Alsip, IL 60658				A. State Manifest Document Number WI 53893	
4. Generator's Phone ( 312 ) 568-3535				B. State Generator's ID 0310035002	
5. Transporter 1 Company Name Avganic Industries, Inc.		6. US EPA ID Number WID0000808824		C. State Transporter's ID 2066	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 608/257-1414	
9. Designated Facility Name and Site Address Avganic Industries, Inc. PO Box 208 - 114 N. Main St. Cottage Grove, WI 53527		10. US EPA ID Number WID0000808824		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 608/257-1414	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. Waste paint related material Flammable liquid nos. ORM-E- NA 1263			1 1 T T	5000	Gal
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above F005/F003	
15. Special Handling Instructions and Additional Information If waste listed in item 11 (a) is undeliverable for any reason--return to generator.					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. Unless I am a small quantity generator who has been exempted by statute or regulation for the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.					
Printed/Typed Name & Position Title Walter Brewer			Signature Walter Brewer		Date 02/12/88
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials			Signature Norman Helgestad		Date 02/13/88
Printed/Typed Name & Position Title NORMAN HELGESTAD			Signature		Date
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials			Signature		Date
Printed/Typed Name & Position Title			Signature		Date
19. Discrepancy Indication Space					
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name & Position Title			Signature		Date

## SPENT SOLVENT WASTE

### LAND DISPOSAL BAN NOTIFICATION FORM

Generator Name: VAN Leer Containers Inc Profile Number: \_\_\_\_\_  
EPA ID Number: ILD085346468 Manifest Number: WI 53893

This form is submitted to AVGANIC INDUSTRIES INC. in accordance with regulations published by EPA at 40 CFR Part 268, which govern the land disposal of restricted hazardous wastes. The hazardous waste identified above has been listed as a restricted waste by EPA under the Part 268 regulations. In accordance with the waste analysis and recordkeeping requirements set forth at 40 CFR 268.7, I have marked the appropriate box below to indicate how my waste must be managed to conform to the regulations. (See instructions on reverse side for marking appropriate box).

#### Restricted Waste Requires Treatment

1. The waste identified above must be treated to the appropriate standard identified in 40 CFR 268 Subpart D.

#### Restricted Waste Treated to Performance Standard

2. The waste identified above has been treated, the treatment residues have been tested in accordance with the facility WAP, and the residues have been found to meet the performance standards specified in 40 CFR Subpart D. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR Part 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

#### Restricted Waste Subject to Variance

3. The waste identified above is subject to a case-by-case extension under 40 CFR 268.5, a petition under 40 CFR 268.6, a nationwide variance under Subpart C, or another exemption from the November 8, 1986 land disposal prohibition date.

I hereby certify that all material submitted in this and associated documents is complete and accurate to the best of my knowledge and information:

Signature

Title

Date

2/12/88

### Instructions for Completing Front Side of Form

**Mark Box 1** if you are the initial generator of a spent solvent waste specified in 40 CFR 261.31 as EPA Hazardous Waste Nos. F001, F002, F003, F004, and F005, and your waste is ineligible for a nationwide variance or other exemption from the November 8, 1986 prohibition date. (See below).

If Box 1 is marked, your solvent waste is restricted and must be treated to the standards set forth in the box below prior to land disposal. For each solvent waste present in your waste shipment, check the appropriate box in front of the applicable treatment standard(s). If based upon best knowledge and information, your waste shipment may contain some or all of the constituents listed below, please mark the appropriate boxes or the box labeled "All of the above" at the bottom.

**Constituent Concentration in Waste Extract (CCWE) Table**

Solvent Constituent	Treatment Standard (mg/l)			
	Wastewaters		All Other Wastes	
Acetone	<input checked="" type="checkbox"/>	0.05	<input type="checkbox"/>	0.59
n-Butyl alcohol	<input checked="" type="checkbox"/>	5.0	<input type="checkbox"/>	5.0
Carbon disulfide	<input type="checkbox"/>	1.05	<input type="checkbox"/>	4.81
Carbon tetrachloride	<input type="checkbox"/>	0.05	<input type="checkbox"/>	0.96
Chlorobenzene	<input type="checkbox"/>	0.15	<input type="checkbox"/>	0.05
Cresols	<input type="checkbox"/>	2.82	<input type="checkbox"/>	0.75
Cresylic acid	<input type="checkbox"/>	2.82	<input type="checkbox"/>	0.75
Cyclohexanone	<input type="checkbox"/>	0.125	<input type="checkbox"/>	0.75
1,2-Dichlorobenzene	<input type="checkbox"/>	0.65	<input type="checkbox"/>	0.125
Ethyl acetate	<input checked="" type="checkbox"/>	0.05	<input type="checkbox"/>	0.75
Ethyl benzene	<input checked="" type="checkbox"/>	0.05	<input type="checkbox"/>	0.053
Ethyl ether	<input type="checkbox"/>	0.05	<input type="checkbox"/>	0.75
Isobutanol	<input checked="" type="checkbox"/>	5.0	<input type="checkbox"/>	5.0
Methanol	<input type="checkbox"/>	0.25	<input type="checkbox"/>	0.75
Methylene chloride	<input type="checkbox"/>	0.20	<input type="checkbox"/>	0.96
Methylene chloride (from pharmaceutical industry)	<input type="checkbox"/>	12.7	<input type="checkbox"/>	0.96
Methyl ethyl ketone	<input checked="" type="checkbox"/>	0.05	<input type="checkbox"/>	0.75
Methyl isobutyl ketone	<input checked="" type="checkbox"/>	0.05	<input type="checkbox"/>	0.33
Nitrobenzene	<input type="checkbox"/>	0.66	<input type="checkbox"/>	0.125
Pyridine	<input type="checkbox"/>	1.12	<input type="checkbox"/>	0.33
Tetrachloroethylene	<input type="checkbox"/>	0.079	<input type="checkbox"/>	0.05
Toluene	<input checked="" type="checkbox"/>	1.12	<input type="checkbox"/>	0.33
1,1,1-Trichloroethane	<input type="checkbox"/>	1.05	<input type="checkbox"/>	0.41
1,2,2-Trichloro-1,2,2-trifluoroethane	<input type="checkbox"/>	1.05	<input type="checkbox"/>	0.96
Trichloroethylene	<input type="checkbox"/>	0.062	<input type="checkbox"/>	0.091
Trichlorofluoromethane	<input type="checkbox"/>	0.05	<input type="checkbox"/>	0.96
Xylene	<input checked="" type="checkbox"/>	0.05	<input type="checkbox"/>	0.15
All of the above	<input type="checkbox"/>		<input type="checkbox"/>	

**Mark Box 2** if you are the owner/operator of a treatment facility that has treated restricted solvent waste to the treatment standards set out in the above table.

**Mark Box 3** and the appropriate box below to indicate that your waste is not restricted from land disposal until November 8, 1988:

- ☐ 1. You are a small quantity generator of 100-1000 kilograms of hazardous waste per month; or
- ☐ 2. The solvent waste is generated from a response action taken under sections 104 or 106 of CERCLA or corrective action taken under sections 3004(u) or 3008(h) of RCRA; or
- ☐ 3. You are the initial generator of a solvent waste that is a solvent water mixture, solvent-containing sludge or solid, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001-F005 solvent constituents listed in the above table.
- ☐ 4. The solvent waste is subject to a case-by-case extension or no-migration petition.
- ☐ 5. Your waste is a residue generated from the treatment of only spent solvent wastes identified in one of the above five categories. (e.g., you are a solvent recycler that has treated only small quantity generator waste, or you are a wastewater treatment plant that has treated only wastewater containing less than 1% total F001-F005 solvent constituents.)

ENVIRONMENTAL PROTECTION AGENCY  
TECHNICAL ENFORCEMENT SUPPORT AT  
HAZARDOUS WASTE SITES

TES IV  
CONTRACT NO. 68-01-7351  
WORK ASSIGNMENT NO. 505

LAND DISPOSAL RESTRICTION INSPECTIONS

EPA REGION V

VAN LEER CONTAINERS  
4300 WEST 130TH STREET  
ALSIP, IL 60658

JACOBS ENGINEERING GROUP INC.  
PROJECT NO. 05-B505-00

PREPARED BY:

METCALF & EDDY, INC.  
85 W. Algonquin Road, Suite 500  
Arlington Heights, IL 60005

EPA Identification Number: ILD 085346468

Facility Representative: B.I. Baman, Production Manager



## Table of Contents

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## List of Attachments

Attachment I	Manifest for Shipment of F005/F003 Waste
Attachment II	RCRA Land Disposal Restriction Inspection Checklist
Attachment III	Photographs of Drum Storage Area

## 1.0 Introduction

A Land Disposal Restriction (LDR) inspection was conducted for Van Leer Containers, 4300 West 130th Street, Alsip, Illinois, on December 11, 1987. This facility was included in Work Assignment Number 505 issued by the U.S. EPA under the TES IV contract. The inspection was conducted under the authority of section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended.

This investigation was required to assess the level of compliance to the Land Disposal Restrictions promulgated November 8, 1986. These restrictions prohibit the land disposal of F001-F005 waste solvents. The purpose of this investigation was to review only the management practices for those particular waste solvents.

The purpose of this report is to supply the EPA with information which they will use to make determination of compliance or violation with respect to the LDR. This report, documentation from the facility and site photographs will be utilized for the determination.

## 2.0 Participants

The inspection was conducted by Carol Meyer and Margaret Murdock of Metcalf & Eddy (TES IV contractors) subcontractors to Jacobs Engineering Group.

Also present for all or part of the inspection were B.I. Baman, Production Manager, Brian J. Farmer, Laboratory Director and Dave Eby, Chemist, all of Van Leer Containers.

## 3.0 Inspection Procedures

Upon arrival at the facility, the TES IV contractors met with Mr. Baman. The purpose and format of the LDR inspection was explained to Mr. Baman. It was also explained that the facility was entitled to declare certain information as Confidential Business Information (CBI). Mr. Baman declined to declare CBI.

During the initial in-briefing, Mr. Baman gave a brief description of the activities presently occurring at the facility. The inspection consisted of two parts: a review of relevant documents and a visual inspection of the facility. At the end of the inspection, the TES IV contractors reviewed their observations with Mr. Baman.

#### 4.0 Facility Description

The Van Leer Containers facility in Alsip, Illinois, is a steel container maker. The facility not only forms the containers but it also decorates and coats the exterior and coats the interior of the 5 gallon pails to 55 gallon drums.

#### 4.1 RCRA Status and Waste Management

The Alsip, Illinois, facility operates under generator ID number ILD 085346468. Spent solvents and waste paint materials are generated as a result of the roller coating, paint spray booths and lithographic operations. The spent solvent is primarily MEK and xylene, therefore, a F005/F003 waste. It is collected and stored in drums and bulked in a tank truck prior to shipment to Avganic Industries for off-site solvent reclamation. The D001 waste paint materials are also shipped for off-site treatment. The paint overspray is a pumpable waste that is collected and stored in drums, then bulked in tank trucks and shipped to various fuel blenders. This waste stream is shipped to Solvent Recovery Resources, EWR, Inc. or American Chemical Services. The non-pumpable sludge, resultant from paint overspray, is drummed and shipped off-site for incineration at LWD, Inc. Finally, the various paint related solid wastes, such as used filters and rags, are drummed and shipped off-site for land filling at the CWM, Emelle, Alabama facility.

#### 4.2 Waste Characterization

The spent solvent generated when the roller coater, spray booths and lithographic areas are cleaned is best characterized by the MSDS for the solvent product. When the solvent is originally purchased from a manufacturer, i.e. GLS Chemicals, it is a mixture of isopropyl alcohol, xylene and methyl ethyl ketone. As the spent solvent is reclaimed at Avganic Industries, the returned product, Van Leer-Wash Solvent 813-T, is contaminated with solvents present in the reclaim process at Avganic. Avganic periodically, supplies virgin solvent to Van Leer Containers to account for the solvent loss in reclamation. Each shipment of recycled solvent is analyzed and the analysis is supplied to Van Leer Containers.

## 5.0 Manifests

The following is a description of the handling of F-solvent waste from the point of on-site generation to shipment off-site for recycling/reclamation. The manifests for shipment of F-solvent wastes were inspected for the following information; the amount of waste generated, the frequency of off-site shipments for recycling/reclamation, the proper classification of the F-solvent waste, and the inclusion of the required notifications and/or certifications.

The manifests inspected included those for the shipment of F-solvent waste from on-site to Avganic Industries, Inc. for recycling/reclamation.

Manifests for shipment are prepared at the Van Leer facility. However, when bulk shipments of F005/F003 spent solvent are sent to Avganic, the required generator notifications are not included. Please refer to Attachment I for an example of the notification omission. Please refer to Attachment II, the checklist, for a summary of waste shipments from Van Leer Containers, November 20, 1986 through November 19, 1987.

## 6.0 Visual Inspection

A visual inspection of points of waste generation and temporary drum storage was conducted. The TES IV contractors were requested not to take photographs inside the facility. However, Attachment III documents the temporary drum storage area with photographs.

In the spray booths, roller coater and lithographic areas, spent solvent is collected in 55 gallon drums. When a drum is completely filled it is transferred to an inside staging area. At this point, every drum is checked to make sure the waste stream has been properly identified and that the drum is in good condition. The drum is labeled and dated and transferred to the outdoor temporary drum storage area. The drums are staged for labeling less than one working day. The drums are accumulated until there is enough volume to fill a tank truck. The drums are not stored longer than ninety days. However, the facility did not keep a log of when drums enter and leave this storage area. The drums are emptied with a vacuum truck and the spent solvent is shipped to Avganic. The empty drums are re-used or sold to a drum reconditioner.



In the temporary storage area drums are stored on a concrete diked pad. They are labeled, dated and in good condition.

## 7.0 Findings and Conclusions

The RCRA Land Disposal Restriction Inspection Checklist was completed for those parts applicable to the generation of F-solvent waste at the Van Leer Containers facility in Alsip, Illinois.

Sections of the checklist that are not applicable are so marked. The checklist is included as Attachment II to this report.

It appears that Van Leer Containers is in violation of 40 CFR 268.7 which requires that they notify the treatment facility of the applicable treatment standards for the F-solvent waste being shipped from their facility.

**ATTACHMENT I**

**MANIFEST FOR SHIPMENT OF F005/F003 WASTE**

November 87

Please print or type. Form designed for use on elite (12-pitch) typewriter. SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>IL D 0 8 5 3 4 6 4 6 8</b>		Manifest Document No. <b>0 0 0 0 1</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address <b>Van Leer Containers, Inc. 4300 W. 130th Street-Alsip, IL 60658</b>						A. State Manifest Document Number <b>WI 53890</b>							
4. Generator's Phone ( <b>312</b> ) <b>568-3535</b>						B. State Generator's ID <b>0 3 1 0 0 3 5 0 0 2</b>							
5. Transporter 1 Company Name <b>Avganic Industries, Inc.</b>				6. US EPA ID Number <b>WI D 0 0 0 8 0 8 8 2 4</b>		C. State Transporter's ID <b>2066</b>							
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone <b>608/257-1414</b>							
9. Designated Facility Name and Site Address <b>Avganic Industries, Inc. P O Box 208-114 No. Main St. Cottage Grove, WI 53527</b>				10. US EPA ID Number <b>WI D 0 0 0 8 0 8 8 2 4</b>		E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone <b>608/257-1414</b>							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. <b>waste paint related material flammable liquid nos. ORM-E NA 1263</b>						<b>001 TT</b>		<b>450.0 G</b>				<b>7005/P003</b>	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information <b>If waste listed in item 11 (a) is undeliverable for any reason--return to generator.</b> <b># 81 T 1-722</b>													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. Unless I am a small quantity generator who has been exempted by statute or regulation for the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
Printed/Typed Name & Position Title <b>TERRY REYNOLDS</b>										Signature <i>Terry Reynolds</i>		Date <b>11/25/87</b>	
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials										Signature		Date	
Printed/Typed Name & Position Title										Signature		Date	
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials										Signature		Date	
Printed/Typed Name & Position Title										Signature		Date	
19. Discrepancy Indication Space <b>correction Item 12a, 8</b>													
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name & Position Title <b>TERRY REYNOLDS</b>										Signature <i>Terry Reynolds</i>		Date <b>11/25/87</b>	



**ATTACHMENT II**

**RCRA LAND DISPOSAL RESTRICTION INSPECTION CHECKLIST**

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Van Leer Containers  
 U.S. EPA I.D. No.: ILD 08534 6468  
 Street: 4300 West 130th Street  
 City: Alsip State: IL Zip Code: 60658  
 Telephone: 312 568 3535

Operator: VAN LEER CONTAINERS  
 Street: 4300 WEST 130th STREET  
 City: ALSIP State: IL Zip Code: 60658  
 Telephone: \_\_\_\_\_

Owner: BERNARD VAN LEER FOUNDATION VP & COO  
PRESIDENT  
1000 N. LAKE  
 Street: ~~1228 AMSTERDAM~~ / 4300 WEST 130th STREET  
 City: ALSIP State: IL Zip Code: 60658  
 Telephone: 312 568 3535

Inspection Date: 12/11/87 Time: 01-30 Weather Conditions: 40°F RAIN

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>CAROL MEYER METCALFEHEDDY</u>		<u>(312) 228-6900</u>
	<u>MARGARET MORRICK METCALFEHEDDY</u>		<u>(312) 228-6900</u>

Facility Representatives: B. I. Baman, Production Manager  
BRIAN J. Farnes, Laboratory Director

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	_____	<u>YES</u>	<u>NA</u>
Transporter	<u>NA</u>	<u>NA</u>	_____
Treater	_____	_____	_____
Storer	_____	_____	_____
Disposer	_____	_____	_____

## INSPECTION SUMMARY

Van Leer Containers forms metal drums from sheet metal. The containers vary in size from 5 gallon pails to 55 gallon drums. The lids are also formed at this facility. F-listed spent solvent is generated as a result of paint cleaning operations. The waste is primarily MEK, xylene and IPA. The F005/F003 waste is collected in drums near the roller coater, the spray paint booths as in the lithographic area. The drums, when full, are removed to an indoor staging area to be properly identified and dated. The drums do not remain in this area longer than one day, after proper labeling, they are moved to outdoor storage. Argama Industries has been contracted to perform off-site reclamation. The F-listed solvent is bulked in a tank truck, while the empty drums are re-used within the facility. The other waste stream generated <sup>by the facility</sup> results from the painting operations. Waste paint and paint contaminated filters and rags are also collected in 55 gallon drums and shipped off-site for treatment or disposal\*. This waste is identified a D001 waste and also stored outside prior to shipment. All waste is shipped off-site prior to the 90 day storage limit.

\* SEE page 8 for a list of the different contractors used



**RCRA LAND DISPOSAL RESTRICTION INSPECTION**  
**APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
<b>A.</b>	<b><u>F-Solvent Wastes</u></b>					
1.	F001	_____	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
2.	F002	<u>X</u>	_____	_____	_____	_____
3.	F003	<u>X</u>	_____	_____	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	<u>X</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes** *not applicable*

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm \_\_\_\_\_

500 ppm \_\_\_\_\_

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
\_\_\_\_\_

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
☐ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? *NA*

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes      ☐ No      ☐ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes      ☐ No      ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Waste Analysis1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes    ☐ No    ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes    ☐ No

If yes, note how this is adequate: By using the MSDS for the T-101 paint thinner they use to clean painting equipment.

- TCLP

☐ Yes    ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes    ☐ No    ☐ NA

If yes, specify the waste stream:

waste paint related material  
flammable liquid N.O.S.  
ORM-E/NA 1263 F005/F003

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes    ☒ No    ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Generator reviews the MSDS sheet of  
any new product used to clean painting  
equipment that would result in  
the generation of spent F-listed solvent.

2. California List Wastes

NA

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes    ☐ No    ☐ NA



- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

What type of absorbent is used? \_\_\_\_\_  
Check the types of waste to which absorbent is added.

- \_\_\_\_\_ Liquid hazardous waste having a pH less than or equal to 2
- \_\_\_\_\_ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- \_\_\_\_\_ Liquid hazardous waste containing metals
- \_\_\_\_\_ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, note how this is adequate: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Testing

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, list test method used: \_\_\_\_\_

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

C. Management

## 1. On-Site Management

☒ waste that exceeds the treatment standards treated, stored, or disposed on-site?

\_\_\_\_\_ Yes ☒ No

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes \_\_\_\_\_ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

\_\_\_\_\_ Yes ☒ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) \_\_\_\_\_ Yes ☒ No

Applicable treatment standards \_\_\_\_\_ Yes ☒ No

Manifest number \_\_\_\_\_ Yes ☒ No

Waste analysis data, if available \_\_\_\_\_ Yes ☒ No

DAVONIC Industries, Inc.  
P.O. Box 208714 No. Main  
Cottage Grove, WI  
13527 F005/F003  
BULK

Identify off-site treatment or storage facilities: see items 1-7  
see last page for manifests summary 11/86-11/87

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

\_\_\_\_\_ Yes ☒ No

② ICA Incinerator  
Accepted a one-time  
waste trichloro (F002)  
from Van Leer Enters.

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

\_\_\_\_\_ Yes \_\_\_\_\_ No

③ LWD, INC.  
Highway 1523  
Calvert City, KY 42049  
D 11 waste paint drums

⑤ American Chemical Services  
420 S. Colfax Ave.  
BRIARCLIFF, IN 46319  
D001 waste paint BULK

⑥ Chemical Waste Management  
Emelle Facility  
Alabama Highway 17 at  
mile marker 163  
Emelle, ALABAMA 35459  
Revised 11-03-87  
D001 DRUMS

④ SRR  
14301 Infirmary Rd.  
East Calabroton, OH 45449  
D001 waste paint drums

⑦ EWR, INC.  
South Broadway  
Coal City, IL 60416 D001 DRUMS

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets treatment standards	_____ Yes	_____ No

Identify off-site land disposal facilities: \_\_\_\_\_

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

*Not applicable*

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

*not applicable*

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, list types of waste treatment units and processes:

\_\_\_\_\_  
\_\_\_\_\_

(N.N. = NO NOTIFICATION as required by 268.17)

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
AVGAMIC INDUSTRIES, INC. WID 000 808824		F005/F003	6000 gal (1 TT)	11-20-86 (N.N.)
"		WASTE PAINT REFINED MATERIAL FLAMMABLE LIQUID Nos. ORM-E UN263	(1 TT) 5500 gal	12-19-86 (N.N.)
"		"	(1 TT) 4500 gal	1-23-87
"		"	4500 gal 1 TT	1-9-87
AMERICAN CHEMICAL SERVICE GRIFFITH IND 016360265		D001 WASTE PAINT / FLAMMABLE LIQUID UN 1263	5500 gal (1 TT)	2-12-87
AVGAMIC		F005/F003	5400 gal	2-18-87
LWD, INC KYD 088438817		D001 WASTE PAINT / FLAMMABLE LIQUIDS UN 1993 (NON PUMPABLE)	79 DRUMS 4345 gal	2-25-87
LWD, INC		D001	76 DRUMS 4180 gal	3-16-87
LWD		D001	80 DRUMS 4400 gal	2-02-87
LWD		D001 23	80 DRUMS 4400 gal	3-25-87 Revised 11-03-87
AVGAMIC		F005/F003	001 TT 6000 gal	3-16-87



ORGANIC

FOOS/FOO3

1 TT  
41,200 lbs

4-1-87

"

"

5200 gal  
1 TT

5-1-87

"

"

5500 gal

5-20-87

SRR

OH D 093 945293

Waste ~~Paint~~  
flam wash. liq.  
UN1993  
D001

1 TT  
2500 gal

5-5-87

Organic

FOOS/FOO3

1 TT  
5500 gal

6-3-87

Chemical Waste  
Management  
HLD 000 622464

Waste paint  
D001, D003  
D008

83 drums  
4565

6-26-87

Organic

FOOS/FOO3

1 TT  
6000 gal

6-30-87

SRR

Solvent/paint  
Waste D001

38 Drums  
2090 gal

6-1-87

ORGANIC

FOOS/FOO3

1 TT  
5300

7-29-87

ALGAMIC

F005/F003

1 TT  
5700 gal

8-11-87

EWR, Inc.

South Broadway St.

Oral City, MO 60416

FLD 087157251

D001

1 TT

3500 gal

8-3-87

"

D001

60 Drum

3300 gal

8-7-87

~~Chemical~~

SRR, Inc.

4301 Infirmary Road

West Carrollton, OH 45449

OH D093945293

D001

5 Drum

275 gal

8-19-87

EWR, INC.

D001

0 DM

0

8-7-87

SRR

D001

5 drums

275 gal

8-19-87

Organic

F005/F003

1 TT

6000 gal

9-2-87

LWD

D001

79 drum

4345 gal

9-21-87

Organic

F005/F003

1 TT

4500 gal

10-29-87

SRR

D001

1 TT

2500 gal

10-12-87

F005/F003

"

F002  
Hazardous Waste Liquid  
NO'S ORN-E NA 9189  
RQ-F002 (TRICHLOR)

F005/F003

"

D001

RQ waste Paint -  
Combustible liquid  
UN 1263

1 TT  
6000 gal

10 -57

1 TT  
4400 gal

10-16-87

1 TT  
26

10-9-87 (NOTICE  
ISSUED)

1 TT  
4400 gal

11-12-87

1 TT  
4500 gal

11-25-87

72 drums  
3960 gals

11-9-87

Organic

"

SCA

Organic

"

LWD

ATTACHMENT III

PHOTOGRAPHS OF DRUM STORAGE AREA





**Drum storage area**



**Drum storage area**



Hazardous Waste Label to Identify F005/F003 Waste and Accumulation Date

X

# SAMPLE

SPENT SOLVENT WASTE

X

## LAND DISPOSAL BAN NOTIFICATION FORM

Generator Name: VAN Leer Containers Inc ☐ Profile Number: \_\_\_\_\_

EPA ID Number: ILD085346468 Manifest Number: WI 53893

This form is submitted to AVGANIC INDUSTRIES INC. in accordance with regulations published by EPA at 40 CFR Part 268, which govern the land disposal of restricted hazardous wastes. The hazardous waste identified above has been listed as a restricted waste by EPA under the Part 268 regulations. In accordance with the waste analysis and recordkeeping requirements set forth at 40 CFR 268.7, I have marked the appropriate box below to indicate how my waste must be managed to conform to the regulations. (See instructions on reverse side for marking appropriate box).

### Restricted Waste Requires Treatment

- ☐ 1. The waste identified above must be treated to the appropriate standard identified in 40 CFR 268 Subpart D.

### Restricted Waste Treated to Performance Standard

- ☐ 2. The waste identified above has been treated, the treatment residues have been tested in accordance with the facility WAP, and the residues have been found to meet the performance standards specified in 40 CFR Subpart D. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR Part 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

### Restricted Waste Subject to Variance

- ☐ 3. The waste identified above is subject to a case-by-case extension under 40 CFR 268.5, a petition under 40 CFR 268.6, a nationwide variance under Subpart C, or another exemption from the November 8, 1986 land disposal prohibition date.

I hereby certify that all material submitted in this and associated documents is complete and accurate to the best of my knowledge and information:

Signature

Title

Date

### Instructions for Completing Front Side of Form

**Mark Box 1** if you are the initial generator of a spent solvent waste specified in 40 CFR 261.31 as EPA Hazardous Waste Nos. F001, F002, F003, F004, and F005, and your waste is ineligible for a nationwide variance or other exemption from the November 8, 1986 prohibition date. (See below).

If Box 1 is marked, your solvent waste is restricted and must be treated to the standards set forth in the box below prior to land disposal. For each solvent waste present in your waste shipment, check the appropriate box in front of the applicable treatment standard(s). If based upon best knowledge and information, your waste shipment may contain some or all of the constituents listed below, please mark the appropriate boxes or the box labeled "All of the above" at the bottom.

**Constituent Concentration in Waste Extract (CCWE) Table**

Solvent Constituent	Treatment Standard (mg/l)			
		Wastewaters		All Other Wastes
Acetone	<input checked="" type="checkbox"/>	0.05		0.59
n-Butyl alcohol	<input checked="" type="checkbox"/>	5.0		5.0
Carbon disulfide		1.05		4.81
Carbon tetrachloride		0.05		0.96
Chlorobenzene		0.15		0.05
Cresols		2.82		0.75
Cresylic acid		2.82		0.75
Cyclohexanone		0.125		0.75
1,2-Dichlorobenzene		0.65		0.125
Ethyl acetate	<input checked="" type="checkbox"/>	0.05		0.75
Ethyl benzene	<input checked="" type="checkbox"/>	0.05		0.053
Ethyl ether		0.05		0.75
Isobutanol	<input checked="" type="checkbox"/>	5.0		5.0
Methanol		0.25		0.75
Methylene chloride		0.20		0.96
Methylene chloride (from pharmaceutical industry)		12.7		0.96
Methyl ethyl ketone	<input checked="" type="checkbox"/>	0.05		0.75
Methyl isobutyl ketone	<input checked="" type="checkbox"/>	0.05		0.33
Nitrobenzene		0.66		0.125
Pyrdine		1.12		0.33
Tetrachloroethylene		0.079		0.05
Toluene	<input checked="" type="checkbox"/>	1.12		0.33
1,1,1-Trichloroethane		1.05		0.41
1,2,2-Trichloro-1,2,2-trifluoroethane		1.05		0.96
Trichloroethylene		0.062		0.091
Trichlorofluoromethane		0.05		0.96
Xylene	<input checked="" type="checkbox"/>	0.05		0.15
All of the above				

**Mark Box 2** if you are the owner/operator of a treatment facility that has treated restricted solvent waste to the treatment standards set out in the above table.

**Mark Box 3** and the appropriate box below to indicate that your waste is not restricted from land disposal until November 8, 1988:

- ☐ 1. You are a small quantity generator of 100-1000 kilograms of hazardous waste per month; or
- ☐ 2. The solvent waste is generated from a response action taken under sections 104 or 106 of CERCLA or corrective action taken under sections 3004(u) or 3008(h) of RCRA; or
- ☐ 3. You are the initial generator of a solvent waste that is a solvent water mixture, solvent-containing sludge or solid, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001-F005 solvent constituents listed in the above table.
- ☐ 4. The solvent waste is subject to a case-by-case extension or no-migration petition.
- ☐ 5. Your waste is a residue generated from the treatment of only spent solvent wastes identified in one of the above four categories. (e.g., you are a solvent recycler that has treated only small quantity generator waste, or you are a wastewater treatment plant that has treated only wastewater containing less than 1% total F001-F005 solvent constituents.)



LABORATORY SPECIFICATIONS #14-1A

DISPOSING OF HAZARDOUS WASTE

DISTRIBUTION:

CHICAGO

CENTRAL

J. Lane	M. Cox	B.J. Farmer
A. Baman	W. Brewer	D. Eby
D. Condon	S. Fugate	B. Moore
J. Heller	A. Majied	J. Johannsen
L. Wade	E. Ziebart	

THE CHICAGO PLANT HAS THE FOLLOWING ONGOING  
HAZARDOUS WASTE STREAMS:

<u>STREAM #</u>	<u>VANLEER DESIGNATION</u>	<u>WASTE DESCRIPTION</u>	<u>SAMPLE MANIFEST</u>
1	DIRTY THINNER	PAGE 2	#1
2	PUMPABLE SLUDGE	PAGE 3	#2,3
3	NON PUMPABLE SLUDGE	PAGE 4	#4
4	MISCELLANEOUS SLUDGE	PAGE 5	#4
5	DRY SOLIDS	PAGE 6	#5

FOR ADDITIONAL INFORMATION ON:

**HANDLING, LABELING, and STORAGE:** See information in  
apendices of this specification.

**SPILL HANDLING:** See Chicago Plant CONTINGENCY PLAN.

SUPERSEDES: NEW!

ISSUED BY: LABORATORY

DATE: APRIL 22, 1988

APPROVED BY: David G Eby

LABORATORY SPECIFICATIONS #14-1A

WASTE DESCRIPTION AND DISPOSER INFORMATION

**WASTE STREAM #1 DIRTY THINNER**

**DESCRIPTION:** Dirty thinner contaminated with paint from the clean up of paint application and associated equipment.

**SOURCE:** All Departments.

**DOT DESCRIPTION:** RQ WASTE PAINT RELATED MATERIAL  
FLAMMABLE LIQUID  
NA 1263, (F003 F005)

**U.S. EPA WASTE CODE:** F003, F005

**SPECIAL INSTRUCTIONS:** Requires Flammable Liquid Label.  
**REQUIRES LAND BAN NOTIFICATION FORM. (See PAGE 2a)**

**APPROVED DISPOSERS:**

1. Avganic Industries  
P.O. BOX 208  
Cottage Grove, WI, 53527  
Phone: (608)-257-1414  
U.S. EPA ID# WID000808824  
ILLINOIS EPA ID# 9550250001

**PRODUCT CODE #** 6907

**AUTHORIZATION #** 6907-R-XXXX-XX (To be furnished by  
Disposer for each pickup)

**DISPOSAL METHOD:** Solvent Recovery for reuse,  
incineration of residuals.

**MANIFEST:** Wisconsin form required  
(See Example Manifest #1).

LABORATORY SPECIFICATIONS #14-1A

WASTE DESCRIPTION AND DISPOSER INFORMATION

**WASTE STREAM #2 PUMPABLE SLUDGE**

**DESCRIPTION:** Fluid paint residues from application equipment,  
and off specification paints.

**SOURCE:** Pail department, and paint mix.

**DOT DESCRIPTION:** RQ WASTE FLAMMABLE LIQUID N.O.S.  
FLAMMABLE LIQUID  
UN 1993, (D001)

**U.S. EPA WASTE CODE:** D001

**SPECIAL INSTRUCTIONS:** Requires Flammable Liquid Label.

**APPROVED DISPOSERS:**

1. EWR Inc.  
South Broadway St.  
Coal City Il. 60416  
Phone: (815)634-2211  
U.S. EPA ID# ILD087157251  
ILLINOIS EPA ID# 0630200003

**PRODUCT CODE #** 14492-D

**AUTHORIZATION #** 000129

**DISPOSAL METHOD:** Secondary fuel program.

**MANIFEST:** Illinois form acceptable  
(See example manifest #2)

2. Solvent Resource Recovery  
4301 Infirmary Road  
West Carrolton OH.45449  
Phone: (513)859-6101  
U.S. EPA ID# OHD093945293  
ILLINOIS EPA ID# 9391130002

**PRODUCT CODE #**SRR A51850

**AUTHORIZATION #** None

**DISPOSAL METHOD:** Secondary fuel program.

**MANIFEST:** Illinois form acceptable  
(See example manifest #3)

LABORATORY SPECIFICATIONS #14-1A

WASTE DESCRIPTION AND DISPOSER INFORMATION

**WASTE STREAM #3 NON-PUMPABLE SLUDGE**

**DESCRIPTION:** Viscous lining overspray,  
booth barrier grease, contaminated with  
small amounts of non dispersible solids.

**SOURCE:** Drum Department.

**DOT DESCRIPTION:** RQ WASTE FLAMMABLE LIQUID N.O.S.  
FLAMMABLE LIQUID  
UN 1993, (D001)

**U.S. EPA WASTE CODE:** D001

**SPECIAL INSTRUCTIONS:** Requires Flammable Liquid Label.

**APPROVED DISPOSERS:**

1. LWD Inc.  
Highway 1523  
Calvert City KY, 42029  
Phone: (502)395-8313  
U.S. EPA ID# KYD088438817  
ILLINOIS EPA ID# 9211570001

**PRODUCT CODE #** EM-45

**AUTHORIZATION #** None

**DISPOSAL METHOD:** Rotary kiln incineration.

**MANIFEST:** Illinois form acceptable  
(See example manifest #4)

2. Solvent Resource Recovery  
4301 Infirmary Road  
West Carrollton OH. 45449  
Phone: (513)859-6101  
U.S. EPA ID# OHD093945293  
ILLINOIS EPA ID# 9391130002

**PRODUCT CODE #** None - New number required.  
(NOTE!: Approval expired 3/88, recertification needed)

**AUTHORIZATION #** None

**DISPOSAL METHOD:** Secondary fuel program. With  
possible incineration of non disper-  
sible solids.

**MANIFEST:** Illinois form acceptable.

LABORATORY SPECIFICATIONS #14-1A

WASTE DESCRIPTION AND DISPOSER INFORMATION

**WASTE STREAM #4 MISCELLANEOUS SLUDGE**

**DESCRIPTION:** Heavy paint booth scrapings and viscous paint drippings heavily contaminated with non-dispersible debris. Free liquids are present.

**SOURCE:** All Departments.

**DOT DESCRIPTION:** RQ WASTE PAINT  
COMBUSTIBLE LIQUID  
UN 1263 (D001)

**U.S. EPA WASTE CODE:** D001

**SPECIAL INSTRUCTIONS:** None

**APPROVED DISPOSERS:**

1. LWD Inc.  
Highway 1523  
Calvert City KY, 42029  
Phone: (502)395-8313  
U.S. EPA ID# KYD088438817  
ILLINOIS EPA ID# 9211570001

**PRODUCT CODE #** EM-45

**AUTHORIZATION #**

**DISPOSAL METHOD:** Rotary kiln incineration.

**MANIFEST:** Illinois form acceptable  
(See example manifest #4)



LABORATORY SPECIFICATIONS #14-1A

WASTE DESCRIPTION AND DISPOSER INFORMATION

**WASTE STREAM #5 DRY SOLIDS CONTAMINATED WITH PAINT**

**DESCRIPTION:** Paint booth filters, contaminated with process related semisolid and hardened paint, cleanup rags, cardboard, paper, related protective clothing and peelable booth liners.  
**No free liquids are allowed.**

**SOURCE:** All Departments.

**DOT DESCRIPTION:** RQ WASTE FLAMMABLE SOLID N.O.S.  
FLAMMABLE SOLID  
UN 1325 (D001)

**U.S. EPA WASTE CODE:** D001

**SPECIAL INSTRUCTIONS:** Requires flammable solid label.

**APPROVED DISPOSERS:**

1. CWM Inc.  
4636 Adams Center Road  
FT. Wayne IN, 46806  
Phone: (219)447-5585  
U.S. EPA ID# IND 078911146  
ILLINOIS EPA ID# 9180035455

**PRODUCT CODE #** ACL A51850

**AUTHORIZATION #** WO# xxxxxx

**DISPOSAL METHOD:** Secure landfill.

**MANIFEST:** Indiana form required.  
(See example manifest #5)

**LIST OF APPENDICES**

Sample Manifest # 1 (Dirty Thinner)

Sample Manifest # 2 (Pumpable Sludge)

Sample Manifest # 3 (Pumpable Sludge)

Sample Manifest # 4 (Non Pumpable Sludge)

Sample Manifest # 5 (Dry Solids)

STORAGE OF HAZARDOUS WASTE

WEEKLY INSPECTION OF HAZARDOUS WASTE CONTAINERS AND STORAGE AREA (Form)

LIQUID HAZARDOUS WASTE - GUIDELINES FOR HANDLING, PACKAGING, AND STORAGE.

HANDLING HAZARDOUS WASTE - PACKAGING

HANDLING HAZARDOUS WASTE - THE TRANSPORTERS CHECKLIST

HANDLING HAZARDOUS WASTE - THE UNIFORM HAZARDOUS WASTE MANIFEST

Please print or type. Form designed for use on elite (12-pitch) typewriter. SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD085346468	Manifest Document No. 00001	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address VAN LEER CONTAINERS INC. 4300 W. 130 TH ST, - ALSIP, IL 60658				A. State Manifest Document Number WI		
4. Generator's Phone (312) 568-3535				B. State Generator's ID 0310035002		
5. Transporter 1 Company Name AVGANIC INDUSTRIES INC.		6. US EPA ID Number WID000808824		C. State Transporter's ID 2066		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 608/257-1414		
9. Designated Facility Name and Site Address AVGANIC INDUSTRIES INC. PO BOX 208 - 114 N. MAIN ST. COTTAGE GROVE, WI 53527		10. US EPA ID Number WID000808824		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 608/257-1414		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. RQ WASTE PAINT RELATED MATERIAL FLAMMABLE LIQUID NA 1263 (F003/F005)						G F003/F005
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above a. PRODUCT CODE #6907 AUTHORIZATION # 6907-R-XXXX-XX				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information IF WASTE LISTED IN ITEM 11(a) IS UNDELIVERABLE FOR ANY REASON -- RETURN TO GENERATOR.						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. Unless I am a small quantity generator who has been exempted by statute or regulation for the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name & Position Title REQUIRED				Signature Required		Date Month Day Year REQUIRED
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name & Position Title REQUIRED				Signature Required		Date Month Day Year REQUIRED
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name & Position Title				Signature		Date Month Day Year
19. Discrepancy Indication Space						
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name & Position Title				Signature		Date Month Day Year





Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address VAN LEER CONTAINERS, INC. 4300 W 130th ST - ALSIP, IL 60658		A. Illinois Manifest Document Number IL [REDACTED]		B. Illinois Generator's ID 0310035002		
4. Generator's Phone (312) 568-3535		C. Illinois Transporter's ID REQUIRED		D. ( ) REQ'D Transporter's Phone		
5. Transporter 1 Company Name REQUIRED		6. US EPA ID Number REQUIRED		E. Illinois Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		F. ( ) Transporter's Phone		
9. Designated Facility Name and Site Address EWR INC. SOUTH BROADWAY ST COAL CITY, IL 60416		10. US EPA ID Number ILD087157251		G. Illinois Facility's ID 0630200003		
H. Facility's Phone (815) 634-2211						
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	L Waste No.	
a. RQ WASTE FLAMMABLE LIQUID N.O.S. FLAMMABLE LIQUID UN1993 (D001)					EPA HW Number XX D001 Authorization Number 000129	
b.					EPA HW Number XX Authorization Number	
c.					EPA HW Number XX Authorization Number	
d.					EPA HW Number XX Authorization Number	
J. Additional Descriptions for Materials Listed Above Q, PRODUCT CODE # 14492-D		K. Handling Codes for Wastes Listed Above In Item #14 1 = Gallons 2 = Cubic Yards				
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name REQUIRED		Signature Required			Date Month Day Year REQ'D	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name REQUIRED		Signature Required			Date Month Day Year REQ'D	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature			Date Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator Printed/Typed Name		Signature			Date Month Day Year	





Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address VAN LEEK CONTAINERS INC 4300 W. 130TH ST ALSIP, IL 60658		1. Generator's US EPA ID No. ILD 085346468		Manifest Document No. 00001		
4. Generator's Phone ( 312 ) 568-3535		5. Transporter 1 Company Name REQUIRED		6. US EPA ID Number REQUIRED		
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address SOLVENT RESOURCE RECOVERY 4301 INFIRMARY ROAD WEST CAROLTON OH 45391		
10. US EPA ID Number OH D093945293		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		
13. Total Quantity		14. Unit Wt/Vol		15. Waste No.		
a. X		b. RQ WASTE FLAMMABLE LIQUID N.O.S. FLAMMABLE LIQUID UN1993 (0001)		c. TT		
d. SAMPLE # 3		e. EPA HW Number XX 0001		f. Authorization Number		
g. EPA HW Number XX		h. Authorization Number		i. EPA HW Number XX		
j. Authorization Number		k. EPA HW Number XX		l. Authorization Number		
m. EPA HW Number XX		n. Authorization Number		o. EPA HW Number XX		
p. Authorization Number		q. EPA HW Number XX		r. Authorization Number		
J. Additional Descriptions for Materials Listed Above a. SRR A51850		K. Handling Codes for Wastes Listed Above In Item #14 1 = Gallons 2 = Cubic Yards T 63				
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name REQUIRED		Signature Required		Date Month Day Year REQ'D		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name REQUIRED		Signature Required		
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		
19. Discrepancy Indication Space		20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Date		
Printed/Typed Name		Signature		Month Day Year		





Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address VAN LEER CONTAINERS, INC 4300 W. 130th ST - ALSIP IL 60658		1. Generator's US EPA ID No. ILD 085346468		A. Illinois Manifest Document Number IL [REDACTED]		
4. Generator's Phone (312) 568-3535		6. US EPA ID Number REQUIRED		B. Illinois Generator's ID 0310035002		
5. Transporter 1 Company Name REQUIRED		6. US EPA ID Number REQUIRED		C. Illinois Transporter's ID REQ'D		
7. Transporter 2 Company Name		8. US EPA ID Number		D. ( ) REQ'D Transporter's Phone		
9. Designated Facility Name and Site Address LWD INC. HIGHWAY 1523 CALVERT CITY KY, 42029		10. US EPA ID Number KYD088438817		E. Illinois Transporter's ID		
				F. ( ) Transporter's Phone		
				G. Illinois Facility's ID		
				H. Facility's Phone (502) 395-8313		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	L. Waste No.	
a. RQ WASTE FLAMMABLE LIQUID NOS. FLAMMABLE LIQUID UN1993 (DOO1)					EPA HW Number XX DOO1 Authorization Number	
b.					EPA HW Number XX Authorization Number	
c.					EPA HW Number XX Authorization Number	
d.					EPA HW Number XX Authorization Number	
J. Additional Descriptions for Materials Listed Above Q. PRODUCT CODE # EM-45		K. Handling Codes for Wastes Listed Above In Item #14 1 = Gallons 2 = Cubic Yards T06/T07				
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.						
Printed/Typed Name REQUIRED		Signature Required		Date Month Day Year REQ'D		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Required		Date Month Day Year REQ'D		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name		Signature		Date Month Day Year		



DO NOT WRITE IN THIS SPACE

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No. 2000 0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law				
3. Generator's Name VAN LEER CONTAINERS, INC. 4300 W 130TH ST - ALSIP IL 60658		ILD08534646800001		1	A. State Manifest Document Number IN [REDACTED]				
4. Generator's Phone (312) 568-3535		6. US EPA ID Number REQUIRED		B. State Generator's ID 0310035002					
5. Transporter 1 Company Name REQUIRED		8. US EPA ID Number REQUIRED		C. State Transporter's ID					
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone REQUIRED					
9. Designated Facility Name and Site Address CWM INC. 4636 ADAMS CENTER ROAD FT WAYNE IN 46806		10. US EPA ID Number IND078911146		E. State Transporter's ID					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. RQ WASTE FLAMMABLE SOLID N.O.S. FLAMMABLE SOLID UN1325(D001)		12. Containers No. Type 1 1 DM		13. Total Quantity		14. Unit Wt/Vol P		15. Waste No. D001	
b.									
c.		SAMPLE #5							
d.									
J. Additional Descriptions for Materials Listed Above a. PROFILE # ACL A51850 WO#XXXX		K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.									
Printed/Typed Name REQUIRED		Signature Required		Month REID		Day 1		Year 86	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name REQUIRED		Signature Required		Month REID		Day 1	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month		Day	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.									
Printed/Typed Name		Signature		Month		Day		Year	

IN 075979

## STORAGE OF HAZARDOUS WASTE CONTAINERS

1. All containers must be correctly labelled, as described in the foregoing information.

Correctly labelled they will show:

- a. Accumulation date (date when designated waste material).
- b. Waste stream identity.
- c. Hazardous waste number.
- d. Generator's identification.
- e. Hazardous class label.
- f. All old labels must be removed.

2. Storage conditions should be:

- a. Correct container –
  - Liquid for outside transportation must be 17E.
  - Liquid for internal storage for transportation by tanker may be 17H.
  - Solid waste – 17H.
- b. All containers must be checked weekly for evidence of any damage which may lead to or be causing leakage of the contents.
- c. Containers must be stored in rows with at least 3 feet between each row. If necessary for space saving drums may be placed in double rows on pallets (4 to a pallet) two high.

3. Inspection:

Storage area is to be inspected weekly and a record kept on the appended form.

WEEKLY INSPECTION OF HAZARDOUS WASTE CONTAINERS AND STORAGE AREA

DATE:

1. Are All Containers Correctly Labelled With -

- A. Accumulation Date
- B. Waste Stream Identification
- C. Hazardous Waste Number and Class
- D. Generators Identification
- E. Hazard Class Label
- F. Have All Old Labels Been Removed

2. Are Storage Conditions Correct -

- A. Container Type - Liquid 17E  
Solid 17H  
Overpacks

- B. Do Any Containers Leak

- C. Are Any Containers Damaged

- D. Are Containers In - Single Rows  
Double Rows

- E. Is There At Least 3 Feet Between Rows

[illegible]



On the other hand, if this same waste material is packaged in bulk such as in a large dump vehicle, the "RQ" value of 5000 pounds could easily be reached. In this instance, the letters "RQ" should appear as part of the proper DOT description.

Reportable Quantity waste material in mixtures or solutions should also be considered. Here's an example:

Cupric sulfate has a Reportable Quantity of 10 pounds.

You have 480 pounds of a solution of 5% by weight of cupric sulfate in a 55 gallon drum.

$.05 \times 480 = 24$  pounds of cupric sulfate.

You have a Reportable Quantity (RQ).

If, however, the solution had been a 1% by weight cupric sulfate solution in a 480 pound 55 gallon container, then the "RQ" would not have been met for that container.

$.01 \times 480 = 4.8$  pounds cupric sulfate

Even if there were 80 drums on the shipment, the "RQ" would not have been met because the material in each container does not exceed the 10 pound "RQ" (Reportable Quantity).

- If an alternate disposal facility is designated, its complete address and phone number should appear in Section 15 of the manifest.
- All signatures on the manifest must match those printed or typed directly to their left.
- All signatures must be followed by date of signatures.
- Many states require the use of that State's hazardous waste manifest when generating or disposing of hazardous waste.

When determining which individual State Uniform Hazardous Waste Manifest is required, the generator should consider the following:

If the State to which the shipment is manifested (consignment State) has their own version of the

Uniform Hazardous Waste Manifest and requires its use, then the generator must use that Manifest.

If the consignment State does not have their own version of the Uniform Hazardous Waste Manifest, but the State in which the generator is located (generator State) does, and requires its use, then the generator must use that State's Manifest.

If neither the generator State nor the consignment State supplies the Manifest, then the generator may use the Federal Uniform Hazardous Waste Manifest.

Be aware that some states do require the shaded areas of the Federal Uniform Hazardous Waste Manifest to be completed.

- The following are codes used for container types (section 12) and units of measure (section 14) of the Uniform Hazardous Waste Manifest.

#### Section #12: Types of Containers

**DM** = Metal drums, barrels, kegs

**DW** = Wooden drums, barrels, kegs

**DF** = Fiberboard or plastic drums, barrels, kegs

**TP** = Tanks portable

**TT** = Cargo tanks (tank trucks)

**TC** = Tank cars

**DT** = Dump truck

**CY** = Cylinders

**CM** = Metal boxes, cartons, cases (including roll-offs)

**CW** = Wooden boxes, cartons, cases

**CF** = Fiber or plastic boxes, cartons, cases

**BA** = Burlap, cloth, paper or plastic bags

#### Section #14: Units of Measure

**G** = Gallons (liquids only)

**P** = Pounds

**T** = Tons (2000 lbs.)

**Y** = Cubic Yards

**L** = Liter (liquid only)

**K** = Kilogram

**M** = Metric Tons (1000 kg.)

**N** = Cubic Meters

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# HANDLING HAZARDOUS WASTE

## THE UNIFORM HAZARDOUS WASTE MANIFEST



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# The Uniform Hazardous Waste Manifest Summary

The hazardous waste management process is surrounded by a complex “paper trail” that follows a waste shipment from cradle to grave.

The key document in this process is the Uniform Hazardous Waste Manifest.

The generator of hazardous waste material is responsible for supplying most of the information contained on the manifest. This block of information characterizes the waste itself. It also identifies all parties involved in the generation, transportation, treatment or disposal of the waste.

When a transporter takes possession of the waste material, he or she is required to sign and date the manifest. Though the manifest serves as a system of checks and balances to all parties in the hazardous waste service industry, it is especially important to the transporter. The transporter’s job depends on an accurate manifest.

When the waste material is eventually received at a treatment or disposal facility, a facility representative is required to sign and date the manifest.

Thus, the manifest is a concise record of who will be handling the waste, a description of the waste itself, and proof of acceptance by the treatment or disposal facility.

## Guidelines General

- No person may offer, transport, transfer or deliver a hazardous waste without a properly completed hazardous waste manifest.
- All information placed on a manifest must be legibly printed or typed. Hand-written manifests are unacceptable.
- All required information sections must be complete and correct.
- When corrections are made on a manifest, the person making the correction must initial and

date the space corrected. Manifests which have numerous corrections should be redone in total.

- When five or more waste streams are being combined into one shipment, a Uniform Hazardous Waste Manifest Continuation Sheet should be used.
- The Uniform Hazardous Waste Manifest is a legally binding document which characterizes and identifies the waste material. It is the key element in the long “paper trail” which tracks hazardous waste from point of generation through eventual disposal. It must be complete and accurate. And it is the law.

## Manifest Entries

- All address entries must be complete with zip codes. All phone numbers must be complete with area codes.
- The U.S. DOT description (section 11) cannot contain any codes or abbreviations unless specifically authorized or required in the Hazardous Materials Table.
- The proper DOT description must be printed or typed in its correct sequential form (e.g., Waste Arsenic Solid, Poison B, UN 1558).
- The letters “RQ” stand for Reportable Quantity. When a Reportable Quantity designation is required, the letters “RQ” must appear on the EPA Hazardous Waste label and on the manifest. Placement of the “RQ” letters must be either before or after the proper DOT description.

The “RQ” is based on the amount of a reportable quantity material present in an individual container (i.e., drummed loads) or the amount on each individual vehicle if the waste is not containerized (i.e., bulk shipments such as roll-offs or dumps).

Using the waste arsenic trioxide example, this material has an “RQ” value of 5000 pounds. This value is listed in the DOT Hazardous Materials table. If the waste is packaged in a standard 55 gallon container, the 5000 pound “RQ” value will not be exceeded. Since a drum is a relatively small container, it is impossible that the 5000 pound limit could be reached. Even if 60 drums are on the shipment, the “RQ” value only applies to a single container. Therefore, in this example the letters “RQ” should not appear on the EPA Hazardous Waste label or on the Uniform Hazardous Waste Manifest, as part of the DOT description.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address						A. State Manifest Document Number									
4. Generator's Phone ( )						B. State Generator's ID									
5. Transporter 1 Company Name				6. US EPA ID Number		C. State Transporter's ID									
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone									
9. Designated Facility Name and Site Address				10. US EPA ID Number		E. State Transporter's ID									
						F. Transporter's Phone									
						G. State Facility's ID									
						H. Facility's Phone									
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.			
						No. Type									
a.															
b.															
c.															
d.															
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above									
15. Special Handling Instructions and Additional Information															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.															
Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.															
Printed/Typed Name						Signature				Month		Day		Year	
17. Transporter 1 Acknowledgement of Receipt of Materials															
Printed/Typed Name						Signature				Month		Day		Year	
18. Transporter 2 Acknowledgement of Receipt of Materials															
Printed/Typed Name						Signature				Month		Day		Year	
19. Discrepancy Indication Space															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name						Signature				Month		Day		Year	

EPA Form 8700-22 (Rev. 4-85) Previous edition is obsolete.



## NOTES

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# LIQUID HAZARDOUS WASTE

## GUIDELINES FOR HANDLING, PACKAGING, AND STORAGE



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# GUIDELINES

- Use personal protective equipment appropriate to the waste handling activity. This may include gloves, aprons, goggles, face shields, or respirators.
- If unfamiliar with the chemical substance being handled, check the Material Safety Data Sheet (MSDS) for complete safety details.
- Collection containers for liquid hazardous waste must be approved for the waste being collected.
- Segregate different wastes by not allowing one type of waste to be mixed with another during collection or storage.



- Make sure that collection containers are free of residual liquids that may contaminate or react with wastes being collected.
- Any collection container should be accurately labeled as to its contents.
- Lids and bungs must be closed or secured properly when moving or storing waste containers.
- Storage containers for a waste identified as hazardous by EPA should be labeled properly with the EPA hazardous waste label.
- All containers must be covered in storage except when adding or removing waste.
- Hazardous waste spills should be contained and cleaned up immediately with notification of and guidance from the supervisor.



## Handling

Hazardous waste in liquid form requires special attention. Liquid waste, unlike solid waste, can only be accepted for disposal at a treatment or incineration facility. The EPA has banned the land filling of liquids.

Collecting waste from its point of generation and getting it safely into storage is the job of a trained and designated waste handler.

To protect yourself from accidental contamination, minimize contact by wearing chemical resistant gloves, aprons or other protective clothing that has been recommended and approved by your safety department.

And bear in mind that a splash hazard exists when working with liquids. Protect your eyes with faceshields, safety glasses, or chemical splash goggles.

One of the most important considerations when handling liquid waste is keeping different substances segregated.

Some chemicals, when mixed together, can have violent reactions or can create a very dangerous situation through release of toxic gases and vapors.

Another consequence of mixing two different wastes together has to do with recycling. If your organization is involved in the eventual re-use of liquid wastes, mixing of incompatible materials

can prevent them from being recycled due to contamination. Such contaminated waste will require more expensive methods of recycling.

And remember, liquid waste destined for a disposal facility must only contain what the manifest says it contains. If a load of liquid waste is contaminated with an unknown substance, the load will be rejected by the disposal facility and returned to the generator.

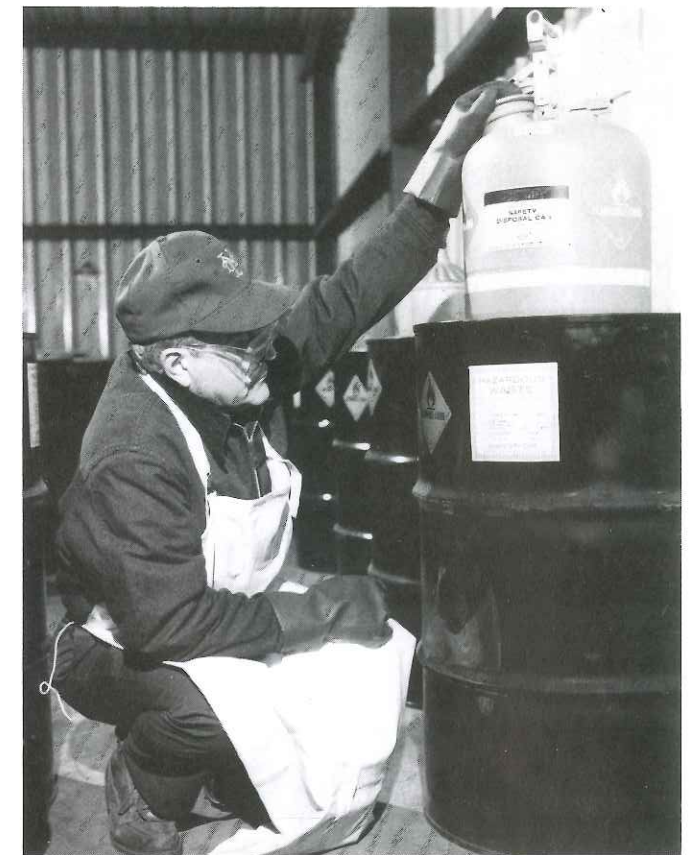
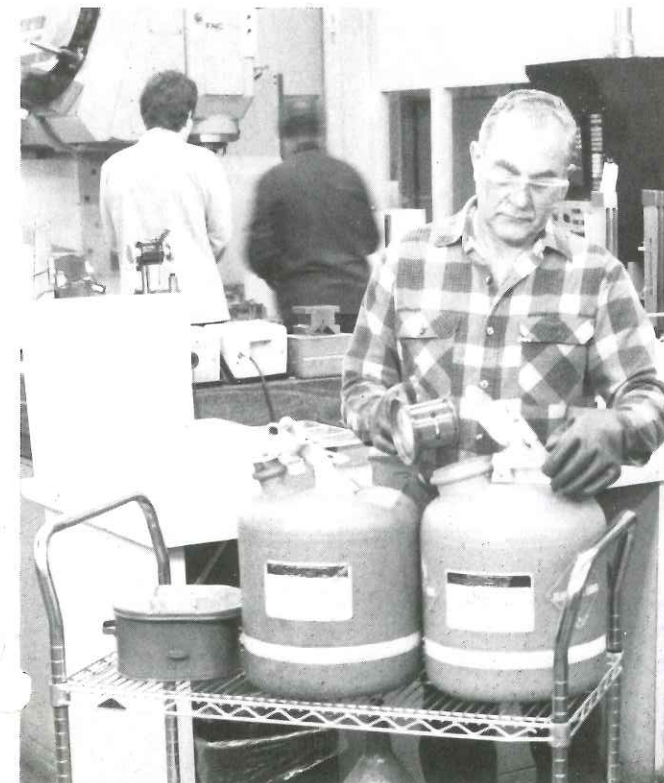
## Packaging

Usually, waste is collected every day or during routine maintenance of equipment and taken to the hazardous waste storage area.

The collection container must be approved for the waste that will go into it. Prior to waste placement, the container must be free of residual liquids that may react dangerously with the new waste.

Any container used to collect hazardous waste must be properly labeled as to its contents and all other original labels should be removed.

The best way to deal with hazardous waste spills is to keep them from happening in the first place. So make sure that all hazardous waste containers are in good condition, are properly sealed, and are loaded securely before you handle them for collection, storage or shipment.



## Storage

Hazardous waste storage takes place in specially designed and monitored areas of the plant. Waste is allowed to accumulate in these areas for a limited amount of time—less than 90 days before disposal or recycling off-site. This limitation holds true unless you have a hazardous waste storage facility permit.

Storage containers must be arranged so that incompatible substances are not near each other. For instance, a waste solvent should not be stored next to an oxidizer. In the event of a drum leak, the two substances could produce a volatile reaction.

Never empty a collection container into a storage container unless you know that the chemicals from both are compatible. Read the label and if you are in doubt, check with your supervisor.

If a container holding hazardous waste is not in good condition—if it begins to leak, transfer its contents into a good container immediately and relabel the new container properly.

Remember that hazardous waste handling procedures are very specific and highly regulated. It's to everyone's benefit that you know what they are.



# Packaging Summary

A vital aspect of the hazardous waste management process is good packaging.

In order for hazardous waste to be dealt with, it must be containerized and labeled in a way that provides for safe storage, transportation, and eventual disposal.

Whether you work in large or small industry, the government, the military, or are self-employed, the requirements for packaging hazardous waste are similar.

You've got to know what containers to use. You need to know how to pack the container the right way. And you must know about labeling. Hazardous waste labeling requirements are very specific. Knowing about all of these elements contributes to a good waste management system.

Personal protective equipment is often necessary to handlers of hazardous waste. Putting protective equipment between you and the possibility of an exposure is a good practice.



The 55 gallon drum is the most commonly used container for packaging hazardous waste. Knowing how to select, fill and label the drum properly, directly affects your employer's ability to comply with the regulations governing hazardous waste. If you are involved in packaging hazardous waste, the consequences of your work can have a dramatic impact on the welfare of the public. Your work also affects the safety of those who handle the waste on down the line.

A good packaging job benefits all concerned in getting hazardous waste safely from the cradle to the grave.

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## Guidelines

### General

- Use proper personal protective equipment.
- Inspect all containers prior to use. Check for:
  - excessive rust or corrosion (especially around seams)
  - missing lid gaskets
  - warped or damaged lids or bungs
  - any abnormality which would jeopardize container integrity.
- No drum may have a label attached to it that does not represent the DOT hazardous class of the material it contains.
- No generator may offer for transport nor may a carrier transport any drum or other packaging container bearing any marking or label which by its color, design, or shape could be confused with or conflict with its required labeling.
- When a waste container is overpacked into a larger container the outside container (overpack) must be labeled appropriately.
- All DOT warning labels must be placed near the proper shipping name. For EPA "Hazardous Waste," that placement would be beside the hazardous waste label.
- When placing two or more labels on one container, they must be placed beside each other.
- The letters "RQ" stand for Reportable Quantity. When a Reportable Quantity designation is required, the letters "RQ" must appear on the EPA hazardous waste label and on the manifest. Placement of the "RQ" letters must be either before or after the proper DOT description.

The "RQ" is based on the amount of a reportable quantity material present in an individual container (i.e., drummed loads) or the amount on each individual vehicle if the waste is not containerized (i.e., bulk shipments such as roll-offs or dumps).

Using the waste arsenic trioxide example, this material has an "RQ" value of 5000 pounds. This value is listed in the DOT Hazardous Materials table. If the waste is packaged in a standard 55 gallon container, the 5000 pound "RQ" value will not be exceeded. Since a drum is a relatively small container, it is impossible that the 5000 pound limit could be reached. Even if 60 drums are on the shipment, the "RQ" value only applies to a single container. Therefore, in this example, the letters "RQ" should not appear on the EPA

Hazardous Waste label or on the Uniform Hazardous Waste Manifest, as part of the DOT description.

On the other hand, if this same waste material is packaged in bulk such as in a large dump vehicle, the "RQ" value of 5000 pounds could easily be reached. In this instance, the letters "RQ" should appear as part of the proper DOT description.

Reportable Quantity waste material in mixtures or solutions should also be considered. Here's an example:

Cupric sulfate has a Reportable Quantity of 10 pounds.

You have 480 pounds of a solution of 5% by weight of cupric sulfate in a 55 gallon drum.

$.05 \times 480 = 24$  pounds of cupric sulfate.

You have a Reportable Quantity (RQ).

If, however, the solution had been a 1% by weight cupric sulfate solution in a 480 pound 55 gallon container, then the "RQ" would not have been met for that container.

$.01 \times 480 = 4.8$  pounds cupric sulfate

Even if there were 80 drums on the shipment, the "RQ" would not have been met because the material in each container does not exceed the 10 pound "RQ" (Reportable Quantity).

## Containerized Solids

- Select proper containers (e.g., 17 H and 17 C open head drums) and inspect for integrity.
- If waste material is designated as solid, then no liquids should be present.
- If the waste material is destined for a landfill, the container should be at least 90% full. Less than 90% full containers jeopardize landfill operations and will result in unnecessary back-charges for filling void space.
- Only that waste material identified to the disposal facility should be placed in the containers. The presence of material other than that designated, including common trash, must be avoided.
- Securely seal container lids.
- Avoid contaminating the outside of the container.
- Properly label and mark all containers. Only waste material regulated by the EPA requires

the "Hazardous Waste" label. If this label is required, be sure that all information sections are properly completed using an indelible marker.

- The "Hazardous Waste" label, if required, should be placed on the side of the container near the top on the first day waste material is placed in it.
- DOT Warning labels, if required, should be placed near the "Hazardous Waste" label or near the DOT Proper Shipping name if the EPA "Hazardous Waste" label is not required.



## Containerized Liquids

- Select proper container (e.g., 17 E closed head drums) and inspect for integrity. Even slight damage or rust could result in leaks.
- Properly fill container leaving a sufficient void space to allow for liquid expansion (e.g., extreme heat or extreme cold).
- Only that waste material designated to the disposal facility should be placed in the container.
- Securely seal bungs using a proper bung wrench. Hand tightened bungs are not acceptable.
- Properly label all containers (refer to containerized solid guidelines).
- Avoid contaminating the outside of the container.

## Bulk Solids

- Inspect bulk container for operational integrity.
- All dump and roll-off doors should be equipped with security bolts, chains or other locking mechanisms in the event the primary locking system fails.



- The use of synthetic liners in bulk containers such as roll-offs and dump vehicles is good practice.
- No free liquids should be present in bulk solid shipments.
- Only that waste material designated to the disposal facility should be placed in the bulk container.
- Loading of bulk solid containers during periods of rainfall should be avoided unless under a covered area.
- Bulk solid containers such as roll-offs and dump vehicles should be securely tarped for storage and transportation. This helps prevent wind dispersion and introduction of rain water. Mesh tarps should not be used.
- Waste material should be carefully loaded, allowing for even distribution over the length and width of the container.
- Contamination of the outside of the bulk container during loading should be avoided.
- Properly label or placard the bulk container as required.

## Bulk Liquids

- Closely inspect all tanks for operational integrity.
- All valves should be equipped with security caps.
- Consider the amount of potential settleable solids contained in the waste liquid.
- Leave sufficient void space to allow for liquid expansion to preclude tank overflow while in storage or in transit.
- Only that material designated to the disposal facility should be placed in the bulk liquid container.
- Tightly secure all filling and discharge ports.
- Avoid contaminating the outside of the container when loading.
- Properly label, placard or mark all bulk liquid containers as required.
- Portable tanks and tank vehicles must have the proper UN/NA number displayed on them if required.

## NOTES

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# HANDLING HAZARDOUS WASTE

## PACKAGING



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- If containers have been stored in the open and have rainwater accumulation on the lids, have them wiped dry before loading.
- For bulk liquids, question the amount of potential settleable solids contained in the waste liquid prior to loading.

### Vehicle Loading

- Avoid loading bulk solids during periods of rain-fall unless in a covered area.
- For bulk solid material, the use of a synthetic liner in the bulk container is good practice.
- Securely tarp all bulk solid loads. Avoid the use of mesh tarping.
- Check that all security locks are in place on all bulk solid containers and dump vehicles.
- Check that all drum loads are securely braced and stabilized for transit.
- When loaded, recount all containers and verify count with that listed on manifest.
- For bulk liquids, check that all fill ports and discharge valves are tightly secured.

### Placarding

- Check that placards agree with what is indicated on the manifest and with warning labels displayed on containers.
- Placards must be displayed on each side and on the rear of the vehicle.

- It is illegal to transport hazardous waste requiring placards without the proper placards being displayed.
- No sign or any other device can be placed on vehicle if by its color, design, shape, or content it could be confused with required placards.
- Placards must be positioned clear of any accessories attached to the vehicle.
- Placards must be located so as to preclude the spraying of water and dirt onto them by the vehicle wheels.
- Placards must be located away from any markings or advertising which could potentially reduce the effectiveness of the placarding.
- Any motor vehicle transporting less than 1000 pounds of hazardous waste does not require placarding.
- For tank trucks and portable tanks, the proper UN/NA number must be displayed on the tank.

### Final Steps

- Check for complete agreement between your load, vehicle placarding and the manifest.
- Sign and date the manifest.
- Perform a final equipment inspection checking your vehicle, the securing of your load, and anything else that could jeopardize safe transit.
- Properly stow the manifest for easy access.

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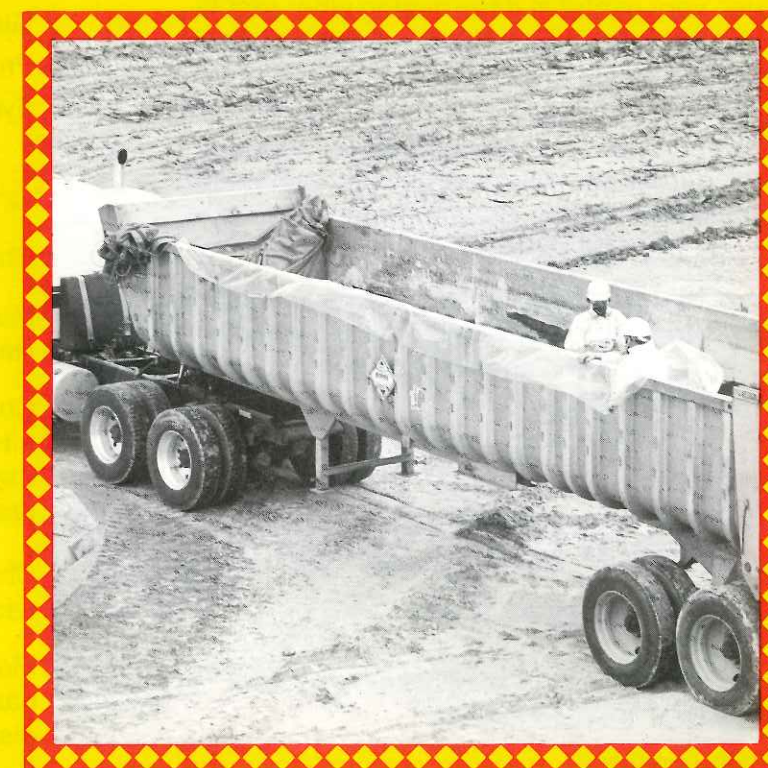
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# HANDLING HAZARDOUS WASTE

## THE TRANSPORTER'S CHECKLIST



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# The Transporter's Checklist Summary

When hauling hazardous waste, nothing can be left to chance. The regulations and standard procedures that affect the transporter are many and often complex. The best way to get the job done correctly is with a checklist. It can be used by the transporter to protect himself or herself, to protect the load, and to protect the generator who is paying the fare.

Using a checklist protects the transporter from common oversights that can have serious consequences. The checklist saves time and can prevent unnecessary delays and costly problems down the road.

The transporter's checklist is designed to promote the safe operation of the transport vehicle. It is also very useful in determining what regulatory requirements are applicable to a particular load. The checklist approach helps to identify common problems before leaving the generating facility: improper drum labeling, incorrect manifesting, inaccurate container counts, containers that could leak or spill, unsafe equipment, inadequate bracing, and incorrect placarding.

The goal of the transporter of hazardous waste is to get the load safely to its destination without incident. The use of a checklist can be a valuable tool toward this goal.

## Guidelines for Transporters

### Initial Preparation

Determine and record the following:

- Proper DOT Shipping Name
- UN/NA Number
- Generator name and complete address
- Proper DOT hazard class for the waste material
- DOT warning labels as required
- EPA Hazardous Waste label as required
- Proper vehicle placarding as required

### Vehicle Inspections

Check out the following equipment:

- Braking Systems
- Steering Systems
- Engine
- Hydraulics
- Electrical
- Tires
- Lights
- Mirrors
- Air
- Security door locks
- All valves and piping for tank vehicles
- Any component that could affect or jeopardize safe operations if faulty

### Safety Precautions

What are the specific hazards associated with the waste material and what personal protective equipment may be required?

- Fire extinguishers
- Respirators
- Gloves
- Protective clothing
- Eye Protection

### Uniform Hazardous Waste Manifest

- Check for completeness.
- Must be hand-printed or typewritten and legible. Hand-written manifests are not acceptable.
- Check for areas that have been changed or altered. These should be initialed and dated by the generator. If numerous corrections are observed, a new manifest should be requested.
- Check that all state required information sections are completed when applicable.
- Many states require the use of that State's hazardous waste manifest when generating or disposing of hazardous waste.

When determining which individual State Uniform Hazardous Waste Manifest is required the generator should consider the following:

If the State to which the shipment is manifested (consignment State) has their own version of the Uniform Hazardous Waste Manifest and

requires its use, then the generator must use that Manifest.

If the consignment State does not have their own version of the Uniform Hazardous Waste Manifest, but the State in which the generator is located (generator State) does, and requires its use, then the generator must use that State's Manifest.

If neither the generator State nor the consignment State supplies the Manifest, then the generator may use the Federal Uniform Hazardous Waste Manifest.

Be aware that some states do require the shaded areas of the Federal Uniform Hazardous Waste Manifested to be completed.

- Check for proper DOT Waste Material Descriptions. For waste material having a "Reportable Quantity" the letters "RQ" must be either at the beginning or end of the description. Abbreviations, unless specifically listed in the DOT Hazardous Materials Table, are prohibited.
- The letters "RQ" stand for Reportable Quantity. When a Reportable Quantity designation is required, the letters "RQ" must appear on the EPA hazardous waste label and on the manifest. Placement of the "RQ" letters must be either before or after the proper DOT description.

The "RQ" is based on the amount of a reportable quantity material present in an individual container (i.e., drummed loads) or the amount on each individual vehicle if the waste is not containerized (i.e., bulk shipments such as roll-offs or dumps).

Using the waste arsenic trioxide example, this material has an "RQ" value of 5000 pounds. This value is listed in the DOT Hazardous Materials table. If the waste is packaged in a standard 55 gallon container, the 5000 pound "RQ" value will not be exceeded. Since a drum is a relatively small container, it is impossible that the 5000 pound limit could be reached. Even if 60 drums are on the shipment, the "RQ" value only applies to a single container. Therefore, in this example, the letters "RQ" should not appear on the EPA Hazardous Waste label or on the Uniform Hazardous Waste Manifest, as part of the DOT description.

On the other hand, if this same waste material is packaged in bulk such as in a large dump vehicle, the "RQ" value of 5000 pounds could easily be reached. In this instance, the letters

"RQ" should appear as part of the proper DOT description.

Reportable Quantity waste material in mixtures or solutions should also be considered. Here's an example:

Cupric sulfate has a Reportable Quantity of 10 pounds.

You have 480 pounds of a solution of 5% by weight of cupric sulfate in a 55 gallon drum.

$.05 \times 480 = 24$  pounds of cupric sulfate.

You have a Reportable Quantity (RQ).

If, however, the solution had been a 1% by weight cupric sulfate solution in a 480 pound 55 gallon container, then the "RQ" would not have been met for that container.

$.01 \times 480 = 4.8$  pounds cupric sulfate

Even if there were 80 drums on the shipment, the "RQ" would not have been met because the material in each container does not exceed the 10 pound "RQ" (Reportable Quantity).

- Check that number of containers loaded matches that listed on the manifest.
- Check weights to preclude overweight shipments.
- Check for proper manifest authorization. The manifest must be signed and dated by the generator.

### Waste Material

- Check that containers are properly labeled and marked.
- Check that all containers are in acceptable condition and are not leaking. If in unacceptable condition, overpacking or repacking should be requested.
- If you are to be hauling bulk solid or containerized solid waste, and you detect the presence of liquid, point it out to the generator. Correction is to everyone's benefit.
- Check that proper containers are being used for waste packaging (e.g., solids—open head drums). Make sure the containers being used match those indicated on the manifest.
- Check that container lids or bungs are properly secured.